

FILED

MAY 25 2000

DRAZIN and WARSHAW, P.C.  
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Attorneys for Defendants  
Grieser and Capital Assets  
RR 6813

WALSH SECURITIES, INC. : UNITED STATES DISTRICT COURT  
Plaintiff, : DISTRICT OF NEW JERSEY  
-vs- : CIVIL ACTION NO. 97-3496 (WGB)

CRISTO PROPERTY MANAGEMENT, LTD., et als; : AFFIDAVIT

Defendant,

STATE OF NEW JERSEY :  
ss  
COUNTY OF MONMOUTH :

RONALD LEE REISNER, of full age, being duly sworn according to law, upon his  
oath, deposes and says:

1. I am an attorney at law of the State of New Jersey and admitted to practice in  
the U. S. District Court for the District of New Jersey.
2. I am familiar with this lawsuit, as the principal attorney assigned to these  
matters by the law firm of Drazin & Warshaw, P.C. where I am employed.

3. To my knowledge and understanding, this law firm was originally retained by Gary Grieser and his businesses commonly known as "Capital Assets" which had offices at 10 West Bergen Place, Red Bank, New Jersey. This firm was paid an initial retainer and began to represent Mr. Grieser and Capital Assets in the Asbury Park Municipal Court, the criminal investigation of the Federal Bureau of Investigation and U. S. Attorney's Office, and this civil suit as well as certain related matters.

4. In August, 1998 Mr. Grieser retained a Miami attorney, Gerald Houlihan, to represent him in the federal criminal investigation. Subsequently, upon information and belief, Mr. Houlihan ended his representation of Mr. Grieser. John A. Whipple, Esq., has been representing Mr. Grieser in certain related criminal matters which, upon information and belief, resulted in an indictment and guilty plea in this Court. I did speak with Mr. Whipple by telephone, and based upon that conversation, Mr. Grieser is believed to be a subject of further investigation by the U. S. Attorney's Office.

5. In the summer of 1998, Jules Rossi, Esq., and his law firm, Rossi and Moscatello, took over the representation of Mr. Grieser in the Asbury Park Municipal Court. Recently, that law firm was replaced by Jeffrey Rosen, Esq., of Little Silver, New Jersey, who has been representing Mr. Grieser and "Capital Assets" in the Asbury Park Municipal Court matters.

6. At that time, we requested that Mr. Grieser retain either the attorneys representing him in the criminal matters or the municipal court matters to assume this case. To date, our firm has received no response.

7. To the best of my knowledge, the Capital Assets companies do not operate at their former offices at 10 West Bergen Place, and I have no knowledge as to what business, if any, those companies conduct at present.

8. In July, 1997 the Federal Bureau of Investigation executed search warrants at 10 West Bergen Place, Red Bank and seized a large volume of documents of Capital Assets. On October 8, 1997, the U. S. Attorney's Office acknowledged, by letter, that it was retaining the large volume records of the business records seized upon execution of the warrants. To the best of my knowledge, the U. S. Attorney's Office still has retained all of the documents taken from Capital Assets Red Bank office.

9. Based upon a review of the records of this law firm, Mr. Grieser has been indebted to this Firm for \$15,856.31 since August, 1998.

10. On September 2, 1998, I underwent a total left hip replacement at the Duke University Medical Center in Durham, North Carolina. Prior to that surgery, I indicated to Mr. Grieser that replacement counsel would be in all of these matters.

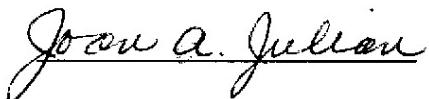
11. This affidavit is being submitted in support of a motion to be relieved as counsel in this matter for defendant Grieser and each of the Capital Asset companies.

This application does not, so far as I am aware, raise any issues of law which would require a brief to be submitted with this motion. The reasons for this motion are set forth in this affidavit. I hereby certify that the foregoing statements are true to the best of my knowledge and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Ronald Lee Reisner

Sworn and subscribed to  
before me this 24<sup>th</sup> day  
of May, 2000.



JOAN A. JULIAN  
A Notary Public of New Jersey  
My Commission Expires Feb. 26, 2002